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8 Attorneys for Defendant, TARGET CORPORATION

9
10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12
13 MONICA MARTINEZ-MONTELLO,
individually,

14 Plaintiff,

15 v.

16 TARGET CORPORATION, a foreign limited-
liability company; DOES 1 through 10; and ROE
17 ENTITIES 11 through 20, inclusive, jointly and
severally,

18 Defendants.
19

CASE NO.: 2:21-cv-02114-CDS-VCF

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

20 Plaintiff, MONICA MARTINEZ-MONTELLO ("Plaintiff"), by and through her counsel of
21 record, DAVID M. MOORE, ESQ., of ERIC BLANK INJURY ATTORNEYS and Defendant,
22 TARGET CORPORATION, by and through its counsel of record, LOREN S. YOUNG, ESQ., of the
23 law firm LINCOLN, GUSTAFSON & CERCOS, LLP, hereby stipulate and request that the Court
24 extend the discovery cut-off deadline by approximately thirty (30) days for the limited purpose of
25 completing the depositions of Plaintiff's treating physicians, Sep Bady, M.D. and Jonathan Sorelle,
26 M.D.

27 Pursuant to Local Rules 6-1 and 26-3, and for good cause as set forth below:

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1 **Discovery Completed to Date:**

- 2 1. All parties have made their initial and supplemental disclosures pursuant to FRCP 26.
- 3 2. Both parties have propounded and provided verified responses to Interrogatories and
- 4 Request for Production of Documents.
- 5 3. Defendant has obtained Plaintiff's surgical records.
- 6 4. Designation of experts.
- 7 5. Exchange of expert reports.
- 8 6. Plaintiff's deposition.

9 **Discovery that Remains to be Completed:**

- 10 1. Deposition of Plaintiff's treating physicians, Sep Bady, M.D. and Jonathan Sorelle,
- 11 M.D.

12 **Reasons that Discovery Has Not Yet Been Completed:**

13 This is a lawsuit involving an injury to Plaintiff's hand, wherein Plaintiff is seeking damages

14 for personal injuries. Plaintiff alleges that she caught her finger between the top of the shopping cart

15 and the point-of-sale counter at the Target checkout station. Defendant has denied liability. Plaintiff

16 alleges carpal tunnel syndrome, ulnar neuropathy at cubital, and Guyon and left trigger finger.

17 Plaintiff also claims she incurred significant medical expenses "as a result of the necessary treatment

18 of her injuries" and that she "will continue to incur damages for future medical treatment necessitated

19 by incident-related injuries she has suffered." The claimed medical expenses include payments for

20 physicians, surgeons, and other health care professionals.

21 Plaintiff's deposition took place on September 14, 2022, which necessitated Defendant obtain

22 additional medical records, including pre-incident records. Defendant then noticed the depositions of

23 Plaintiff's treating providers, Sep Bady, M.D. and Jonathan Sorelle, M.D., and served deposition

24 subpoenas on October 24, 2022. The depositions are currently scheduled to take place on November

25 2nd and 3rd, 2022. The thirty (30) day extension of the Discovery Cut-Off deadline will ensure

26 sufficient time to complete the depositions, allowing for potential rescheduling or continuances.

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Proposed Schedule for Completing Discovery:

WHEREFORE, the parties request that this Court extend the Discovery Cut-Off deadline for the limited purpose of taking the depositions of Sep Bady, M.D. and Jonathan Sorelle, M.D., as follows:

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-Off	October 31, 2022	November 30, 2022
Dispositive Motions	December 1, 2022	December 1, 2022
Joint Proposed Pre-trial Order	January 3, 2023	January 3, 2023

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

DATED this 25th day of October, 2022.

DATED this 2nd day of November, 2022.

Approved and Agreed to by:

Approved and Agreed to by:

LINCOLN, GUSTAFSON & CERCOS

ERIC BLANK INJURY ATTORNEYS

/s/ Loren S. Young

/s/ David M. Moore

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MARTINEZ-MONTELLO

IT IS SO ORDERED.



United States Magistrate Judge

Date: 11-7-2022